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Attorney for Defendants REYHAN PASINLI and  
TOTAL-APPS, INC.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH;  
AMUND THOMPSON;  
ISABEL RAMOS;  
ANTHONY RAMOS;  
MICHAEL NIBARGER,

Plaintiff,

VS.

RYAN CARROLL;  
MAX K. DAY;  
MAX O. DAY;  
MICHAEL DAY;  
JARED DAY;  
MATTHEW CROUCH;  
CHRISTINE CARROLL;  
TROY MARCHAND;  
BONNIE NICHOLS;  
TRAVIS MARKER;  
REYHAN PASINLI;  
YAX ECOMMERCE LLC; PRECISION  
TRADING GROUP, LLC;  
WA DISTRIBUTION LLC;  
PROVIDENCE OAK PROPERTIES, LLC;  
WA AMAZON SELLER LLC;  
YAX IP AND MANAGEMENT INC. (D.B.A.  
“FULFILLABLE”);  
MKD INVESTMENT ADVISOR, LLC;  
MKD FAMILY BENEFICIARY, LLC;

[illegible]

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1 MKD FAMILY PRIVATE MANAGEMENT )  
COMPANY, LLC; )  
2 MAX DAY CONSULTING, LLC; )  
HOUTEX FARM EQUITY PARTNERS LLC; )  
3 BUSINESS FINANCIAL SOLUTIONS )  
4 ADVISORY LLC; )  
EVO MAXX LLC; )  
5 WWKB LLC; )  
DREAMS TO REALITY LLC; )  
6 QUANTUM ECOMMERCE, LLC; )  
7 WHOLESALE UNIVERSE, INC.; )  
THE LAW OFFICE OF TRAVIS R. MARKER, )  
8 A PROFESSIONAL CORPORATION (D.B.A. )  
“MARKER LAW AND MEDIATION”); )  
9 PARLAY LAW GROUP A PROFESSIONAL )  
CORPORATION; )  
10 TOTAL-APPS, INC.; )  
11 WELLS FARGO BANK, N.A., )  
Defendants. )

13 Plaintiffs DAVID HOUGH, AMUND THOMPSON, ISABEL RAMOS, ANTHONY  
14 RAMOS, and MICHAEL NIBARGER (“**Plaintiffs**”) and Defendants TOTAL-APPS, INC. (“**Total**  
15 **Apps**”) and REYHAN PASINLI (“**Pasinli**”, and collectively with Total Apps, “**Defendants**”), by  
16 and through their respective counsel, hereby stipulate as follows:

17 WHEREAS, Plaintiffs filed their Second Amended Complaint on or about December 4,  
18 2024.

19 WHEREAS, on December 13, 2024, the Court vacated jurisdictional defendants’ pending  
20 motion to dismiss the First Amended Complaint, and ordered jurisdictional defendants to respond  
21 to the Second Amended Complaint by February 14, 2025.

22 WHEREAS, Counsel for Defendants and Counsel for Plaintiffs have agreed to extend  
23 Defendants’ deadline to respond to the Second Amended Complaint to February 14, 2025, the same  
24 date as the jurisdictional defendants’ deadline to respond to the Second Amended Complaint.

25 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between Plaintiffs and  
26 Defendants, through their respective counsel, that:

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Defendants deadline to respond to the Second Amended Complaint is on or before February 14, 2025.

**IT IS SO STIPULATED.**

Dated: December 23, 2024

WATTS LAW LLP  
Attorneys at Law

By: /s/ Geoffrey C. Brethen  
GEOFFREY C. BRETHEN  
Attorney for Defendants REYHAN PASINLI  
and TOTAL-APPS, INC.

Dated: December 23, 2024

BANKS LAW OFFICE

By: /s/ Nico Banks  
NICO BANKS  
Attorney for Plaintiffs DAVID HOUGH,  
AMUND THOMPSON, ISABEL RAMOS,  
ANTHONY RAMOS, and MICHAEL  
NIBARGER

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**WORD COUNT COMPLIANCE CERTIFICATION**

The undersigned, counsel of record for Defendants REYHAN PASINLI and TOTAL-APPS, INC., certifies that this brief contains fewer than 7,000 words, which complies with the word limit of L.R. 11-6.1

Dated: December 23, 2024

/s/ Geoffrey C. Brethen

Geoffrey C. Brethen

**ATTESTATION**

Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: December 23, 2024

/s/ Geoffrey C. Brethen

Geoffrey C. Brethen

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PROOF OF SERVICE

STATE OF CALIFORNIA )  
 ) ss:  
COUNTY OF ORANGE )

I am employed in the County of Orange, State of California, at the law firm of WATTS LAW LLP (9900 Research Drive, Irvine, California 92618). I am over the age of 18 and not a party to the within action.

On December 24, 2024, I served, in the manner indicated below, the foregoing document described as **STIPULATION TO STAY DEFENDANT TOTAL-APPS, INC.'S AND REYHAN PASINLI'S TIME TO FILE A RESPONSE PLEADING TO PLAINTIFFS' SECOND AMENDED COMPLAINT** on the interested parties to this action as follows:

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1 ☒ (BY ELECTRONIC MAIL) I caused the aforementioned document(s) to be served via  
2 electronic mail to the electronic addressee(s) listed on the attached mailing list. Such  
3 document was transmitted successfully from my e-mail address to the indicated addressee(s).

4 I declare under penalty of perjury under the laws of the State of California that all the  
5 foregoing is true and correct. Executed on December 24, 2024, at Irvine, California.

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Allie Ward, Declarant  
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